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**RESPONSE TO PUBLIC DRAFT REPORT ON RECOMMENDATIONS
REPORT TO THE LEGISLATURE ON LANDSCAPE WATER USE
EFFICIENCY**

Dear Julie Saare-Edmonds, Independent Technical Panel and Department of
Water Resources,

Thank you for the opportunity to comment on recommendations developed by the ITP regarding water use efficiency. Landscape water conservation is a very important topic in our state which affects manufacturing, businesses, jobs, and all citizens. While the conservation on innovative landscape water conservation ideas needs to continue, Hunter Industries believes that the ITP and DWR are moving too quickly with new ideas with total disregard of the effects of both and old and newly established regulations. The ITP and DWR should thoroughly review and find solutions to the following topics prior to developing any new landscape water use proposals.

1. Management: The ITP and DWR have established management protocols (audits, plan checks, permission to impose fines, etc) with the assumption that local agencies and water districts will be performing the task of enforcement. Agencies (cities and counties) are so under staffed/funded as it is, very little management can be achieved to meet MWELO regulations. While water districts are businesses, which provide a product (water), and are not geared to manage water use after it is delivered. A stronger management system needs to be established in order to enforce current regulations prior to proposing new regulations.
2. Management Continued: DWR continues to grow its regulatory umbrella of landscape water use in California through MWELO and future proposals. As the rules and regulations grow, the department responsible for managing the regulations does not. Currently, the 39.15 million people in California have 1 contact person at DWR is regards to these regulations (Julie). Communication is challenging and makes full endorsement/compliance of existing and proposed regulations extremely difficult. The State needs to invest/grow its own management system to adequately service the affected populous prior to proposing new regulations.
3. Agency Communication: MWELO 2010 and 2015 has set forth regulations that must be met or exceeded by local agencies. In many cases, interpretation of MWELO leads to drastic differences from the original intent and, sometimes, is not enforced at all. The inclusion of other variables such as the State wide goal of 25% water reduction, specific city water reductions, specific city watering day restricts, specific city runtime cap restrictions (which actually promotes the use of very inefficient irrigation methods), and specific City irrigation product

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prescriptions builds a perfect scenario for an extremely confused industry and deployment of landscape water saving methods. The ITP and DWR needs to work/communicate much more closely with local agencies to develop a system that is easy for the industry to practice and preach prior to proposing new regulations.

4. Review of Existing Regulations: During the 2010 develop of MWELO, a 5 year review was promised to evaluate the effectiveness of enacted regulations. The review was never conducted for several presumable reasons most notably the drought and executive order. MWELO 2015 was quickly written and enacted, and now the ITP has proposed on another set of water regulations/restrictions without the slightest understanding of the water savings value, or lack thereof, of the regulations enacted back in 2010. With the recent facts being delivered that huge amounts of monetary rebates were given for turf removals with an extremely minimal amount of water savings in return it is only right that DWR and ITP conduct a full study of the effects of 2010 and 2015 MWELO. It is senseless for the ITP to continue to propose on water regulations without determining the effectiveness of water savings and the overall effect on the landscape industry incurred from current enacted
5. State Water Plan and Potable Water Use Reductions: The current proposals from the ITP to the title 23 extract share that the state has a goal to reduce potable water use by 50% over the next 20 years. No publication of this goal can be found so how did the ITP come up with this number. ITP needs to disclose their sources on their published potential water savings numbers and explain why they are different from the proposals and goals published in the California Water Plan.
6. Potable Water Use Reduction: The ITP recommendations to reduce potable landscape water use by 50% will have potentially dramatic and catastrophic consequences to an entire industry of professionals and irreparable damage to communities and urban spaces for a minimal impact on statewide water resources. A study needs to be conducted, and examined, to compare the potential amount jobs, businesses, and economic growth affected to potential water savings gained prior to any such proposal is enacted. Furthermore, the ITP and DWR needs to place a value on landscapes and public/private landscape use to accurately compare potential water savings to landscape loss/conversion prior to any such proposal being enacted.
7. Public Comments: During the 2015 MWELO rewrite, the most delivered public comment was in regards to existing landscape and how these landscapes are the worst water waste offenders. Faced with a tight deadline, the ITP and DWR were not capable of tackle all aspects of potential water savings (including existing landscapes) and was only able to amend regulations for new and rehabilitated landscapes. Less than 3 months in enactment, the ITP has published new proposals with a

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seeming refusal to tackle the worst water waste offenders; existing landscapes. Currently, most new and rehabilitated landscape projects are going through some degree of plan check process that requires water conservation practices. Landscapes Architects, designers, and licensed contractors have been practicing water conservation methods for years, with or without government regulation, because they are aware of the benefits and wish to continue to use water responsibly to sustain their livelihood. These are not the industry sectors the ITP and DWR needs to be worried about. Any future proposals for new and renovated landscapes should be suspended until the ITP and DWR can develop and enact solutions to achieve landscape water reduction methods in existing landscapes.

Thank you again for your devotion for landscape water conservation. Hunter truly believes that sustainable solutions for the environment and economy can be developed and implemented if we all work together.

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